

# INEOS ABS

## INEOS ABS (USA) Corporation

356 Three Rivers Parkway  
Addyston, OH 45001

Tel (513) 467-2400

Fax (513) 467-2241

[www.ineos.com](http://www.ineos.com)

April 17, 2013

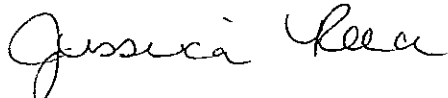
Attn: Compliance Tracker, AE-17J  
Air Enforcement and Compliance Assurance Branch  
U.S. Environmental Protection Agency Region 5  
77 West Jackson Boulevard  
Chicago, Illinois 60604

RE: Consent Decree Civil Action No. 1:09-CV-545  
Effective Date February 4, 2010

Dear Sirs:

Please find attached the Quarterly Report for First Quarter 2013. Please contact me at (513) 467-2321 or [Jessica.reece@ineos.com](mailto:Jessica.reece@ineos.com) if you have any questions concerning the submitted information.

Respectfully Submitted,



Jessica Reece  
Utilities Engineer  
INEOS ABS (USA) Corporation

cc: M. Palmero, USEPA Region 5  
T. Kalman, OEPA  
G. Bachmann, Ohio AG  
B. Pray (M. Kramer), SWOAQA

**INEOS ABS (USA) CORPORATION'S ADDYSTON, OH PLANT**  
**CONSENT DECREE QUARTERLY REPORT**

Consent Decree Civil Action No. 1:09-CV-545

Effective Date February 4, 2010

Reporting Period: 1/1/13 – 3/31/13

**I. INTRODUCTION**

The following report contains the required information about INEOS ABS' compliance activities associated with the requirements in Paragraph 50 a. and 50 b. in the Consent Decree.

**II. LEAK DETECTION AND REPAIR (LDAR) REPORTING OBLIGATIONS**

Per Appendix A of the Consent Decree, INEOS ABS submitted the following reports to the U.S. EPA and Ohio EPA:

**A. COMPLIANCE STATUS REPORTS**

The Second Half 2012 Compliance Status Report was submitted on January 15, 2013.

**B. CORRECTIVE ACTION PLANS**

The Corrective Action Plan for the 2012 external audit was completed on October 1, 2012. The FINAL Corrective Action Plan was submitted for approval on January 8, 2013. All corrective actions identified in the plan have been completed.

**C. CERTIFICATE OF COMPLIANCE**

No certificate was required to be submitted during this period.

**III. FLARE MONITORING INSTRUMENTS REPORTING OBLIGATIONS**

Per Paragraph 23 of the Consent Decree, INEOS ABS submitted the following reports to the U.S. EPA and Ohio EPA:

- Fourth Quarter 2012 Monitoring report was submitted on January 8, 2013.

**IV. NONCOMPLIANCE WITH CONSENT DECREE**

Per Paragraph 50 b. of the Consent Decree, INEOS ABS submitted the following letters of noncompliance to the U.S. EPA and Ohio EPA:

**A. LDAR Internal Audit –Fourth Quarter 2012**

Items that were added to the LDAR Inventory as a result of the 3<sup>rd</sup> and 4<sup>th</sup> Quarter 2012 internal inspections reported in the Fourth Quarter 2012 Quarterly report were monitored in the 1<sup>st</sup> quarter 2013 with the exception of those in P015. The additional valves, OELs, and connectors in P015 will be monitored within one week of the process unit startup in April 2013.

**B. LDAR Missed Monitoring – Letter Dated January 8, 2013**

In process unit P004, 711 connectors were not monitored in calendar year 2012. The process unit shut down unexpectedly due to an equipment malfunction in October. The equipment could not be repaired by the end of the year. Connectors were scheduled to be monitored in this process unit in November. The connectors were monitored within two weeks of the process unit startup in January 2013.

In process unit P015, 26 connectors and three difficult-to-monitor valves were not monitored in calendar year 2012. In 2012, this area was in operation for less than one week in May. During that time, all valves, open-ended line, and pumps were monitored. In May 2012, it was not known that this product would not be scheduled for the remainder of the year. Current plans have this area of the process unit used next in December 2013. At that time, all connectors, valves, open-ended lines, and pumps will be monitored.

**C. LDAR Difficult to Monitor and Delay of Repair– Letter Dated February 18, 2013**

In process unit P004 there were 6 valves misclassified at difficult-to-monitor when actually they are normal to monitors. The classification of the valves were changed in the LDAR program and monitored within one week.

In process unit P004 one valve was on Delay of Repair awaiting a process unit shutdown. The valve was repaired but not monitored the day the process unit started up. The valve was monitored 3 days later.

Additional changes have been made to the inventory:

Process Unit	No. of Valves		No. of OELs		No. of Connectors	
	Added	Deleted	Added	Deleted	Added	Deleted
P001	2	3	1	1	14	7
P004	1	1	2	2	63	5
P015	3	0	0	0	68	0
P021	1	0	0	0	2	0
P042	2	4	2	0	1	0
P047	4	2	0	1	11	5
P048	0	0	3	0	25	0

**V. CERTIFICATION**

I certify under penalty of law that I have examined and am familiar with the information in the enclosed documents, including all attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for knowingly submitting false statements and information, including the possibility of fines or imprisonment pursuant to Section 113(c)(2) of the Act, and 18 U.S.C. §§ 1001 and 1341.

Respectfully Submitted,



Eric Cassisa  
Site Manager, NAFTA  
INEOS ABS (USA) Corporation

O:\nhcom\ENVIRONMENTAL\Consent Decree Actions\Quarterly Reports\2012\Qtr4 2012 Report.doc